

MEMO ENDORSED

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March 4, 2024

Hon. Nelson S. Román
 United States District Court
 Southern District of New York
 300 Quarropas Street
 White Plains, New York 10601

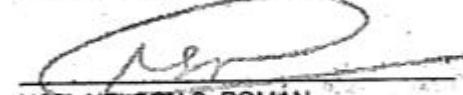
Defendant's request is GRANTED without objection from the Pre-Trial Services Officer and the Government. Defendant's bail conditions are modified to permit him to maintain non-stationary employment while on home detention, so as to allow work-related travel during work hours within the Southern and Eastern Districts of New York. The Clerk of the Court is directed to terminate the motion at ECF No. 16.

Dated: March 6, 2024
 White Plains, NY

re: *United States v. Fray (Anthonio Randall)*, 24-cr-67-3 (NSR)

Dear Judge Román:

SO ORDERED:



HON. NELSON S. ROMÁN
 UNITED STATES DISTRICT JUDGE

This letter is an application to modify the bail conditions for Anthonio Randall to permit him to maintain non-stationary employment while on home detention, so as to allow work-related travel during work hours within the Southern and Eastern Districts of New York. Mr. Randall's bail conditions include home detention enforced by GPS location monitoring, with exceptions that include employment. The bail conditions also require that Mr. Randall seek or maintain employment.

Mr. Randall is employed by Special Citizens, a social services organization in Yonkers that provides services for disabled adults. He had secured work with Special Citizens prior to his initial presentment in this case. As part of his duties, his employer expects him to assist in transporting disabled clients to appointments and other activities (all of this is within the SDNY/EDNY).

Mr. Randall's pre-trial services officer, Francesca Piperato, has no objection to this modification. Ms. Piperato advises that her office's home-detention policy ordinarily calls for employment to be stationary, and she concurs with the requested modification to permit non-stationary employment so that Mr. Randall can continue his employment. I am advised, by AUSA Margaret Vasu, that the government has no objection to this modification so long as the work-related travel is limited to SDNY/EDNY.

Very truly yours,
 /s/ *Theodore S. Green*
 Theodore S. Green
Attorney for Anthonio Randall

cc: All counsel (by ECF)
 Francesca_Piperato@nyspt.uscourts.gov